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June 13, 2003

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: EX PARTE**

***In the Matter of Qwest Communications International, Inc.  
Consolidated Application for Authority to Provide In-Region,  
InterLATA Services in Minnesota; WC Docket No. 03-90***

Dear Ms. Dortch:

MCI submits this letter to update the Commission on MCI's reject rate in the Qwest region and to describe a new problem that is affecting MCI. Unfortunately, MCI's reject rate remains above 50%. This is so despite the fact that on May 2, MCI implemented a new release based on which it is now pulling addresses from Qwest's service address validation (SAV) function, as Qwest directs, rather than from Customer Service Records. While this change has reduced MCI's address-related rejects by approximately 50%, there are several reasons why MCI's overall reject rate remains extremely high, some of which are attributable to MCI but several of which are caused by Qwest's unnecessarily complex systems. The Qwest-caused reasons are as follows:

- (1) Qwest returns multiple service addresses on SAV inquiries and returns multiple CSRs more frequently than MCI expected. MCI has explained to the Commission many times why Qwest should not return multiple responses to pre-order inquiries and why MCI's systems are not set up to handle the return of multiple responses.
- (2) Qwest rejects many orders based on its requirement that CLECs submit CALA codes. As we have explained previously, Qwest is the only ILEC that requires CLECs to submit such codes, and there is no reason for it to do so.
- (3) Qwest rejects orders that do not include the correct customer code, which is a Qwest code that changes after CLECs submit their initial migration orders. As

MCI's base of customers grows, the ratio of account maintenance orders to migration orders increases, which increases the rejects caused by the customer code requirement. Because the customer code changes after submission of the migration order, the CLEC must obtain a new code to submit an account maintenance order. As we have discussed before, during development Qwest told MCI that it could obtain the new code from the FOC or the completion notice, but it turns out that Qwest often changes the code even after sending the completion notice. Thus, MCI can only be sure that it has the correct customer code if it re-accesses the CSR before submitting an account maintenance order. Once a customer is an MCI customer, MCI should be able to rely on information in its own databases to submit account maintenance orders. This problem is further complicated because it appears to exist only in Qwest's Eastern Region – having different rules in different regions obviously complicates MCI's software development and processes.

(4) Rejects for CLEC-to-CLEC migrations continue to increase. As our market entry expands, more customers migrate to MCI from other CLECs. Qwest is the only region where MCI must indicate that an order is a CLEC-to-CLEC migration and where MCI must use different Universal Service Order Codes on such orders than on other orders. Although CLEC-to-CLEC rejects have increased for this reason, we expect some relief when we move to EDI version 12.0 later this month.

MCI hopes that its reject rate will drop when it moves to EDI version 12.0 later this month and expects that it will, assuming release 12.0 is working properly. But the change will not be a panacea. The CALA code issue will continue to affect account maintenance orders, as will the customer code issue. Qwest should fix these systems issues before it obtains section 271 authorization for another state.

In addition, MCI is experiencing a new problem in the Qwest region. Qwest is requiring a cumbersome and expensive fix for a problem that it indisputably caused. When MCI customers access Qwest operator services and directory assistance (branded as MCI), Qwest should not provide the customers the option of completing their long distance calls for them. For example, if a customer asks directory assistance for a number in New York, Qwest should not provide the customer the option of completing the call to New York. The reason for this is that Qwest bills MCI for completing the call yet MCI cannot pass this charge on to the customer. But Qwest's business rules did not clearly document how MCI should request that "Directory Assistance Call Completion" (DACC) be blocked for MCI customers. Apparently, unlike every other ILEC, Qwest requires the CLEC to submit a USOC requesting DACC blocking on every single Local Service Request. Since MCI did not know to submit such USOCs, its customers have been able to request call completion and MCI has been charged for such call completion.

Qwest has admitted its documentation error and fixed the documentation. But the corrected documentation does not cure the problem for MCI's current customers. These customers can continue to request call completion on operator services and directory assistance calls, and MCI continues to be charged for call completion. MCI has told Qwest that it should simply begin blocking call completion for these MCI customers.

Qwest initially responded that MCI must instead submit a new LSR for each one of its tens of thousands of existing customers. That is extremely burdensome, especially because each of these LSRs would require the customer's new customer code, meaning that MCI would have to obtain each customer's current CSR before placing these orders. It is entirely inappropriate for Qwest to force MCI to assume this burden in order to correct a Qwest mistake.

MCI proposed providing to Qwest a listing of the ANIs of our current Neighborhood customers and having Qwest add the blocking FID to those customers. Qwest responded that instead it would write an ad hoc program to update MCI's existing records to reflect that DACC should be blocked, and requested that MCI share the cost of doing so. Qwest estimates the cost of the fix to be \$100,000 to \$200,000, and, in any case, would not occur until September or October. Qwest should fix the problem now and should not impose a delayed, expensive process on MCI to compensate for Qwest's mistakes.

Please let me know if you have any questions about this matter.

Sincerely,  
/s/  
Lori Wright

CC: G. Cohen  
W. Dever  
J. Tignor  
J. Myles  
G. Remondino  
R. Harsch